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UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 SAN JOSE DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

LIANG CHEN, DONALD OLGADO,  
 WEI-YUNG HSU, and ROBERT  
 EWALD,

Defendants.

No. CR-17-603 BLF

**DEFENDANTS' JOINT RESPONSE TO  
 GOVERNMENT MOTION IN LIMINE NO.  
 2 [ADMIT BUSINESS RECORDS]**

Date: June 24, 2021

Time: 1:30 p.m.

Hon. Beth Labson Freeman  
 Courtroom 3

**MEMORANDUM OF POINTS AND AUTHORITIES**

The government has moved for an order admitting into evidence at trial specified business records produced by three internet service providers, AT&T, Google and Yahoo! in response to grand jury subpoenas. Government's Motion In Limine No. 2, Dkt. 216, p. 2-3. Defendants have no objection to this request and are prepared to enter into an appropriate stipulation for admission of the specified records.

Dated: June 17, 2021

Respectfully submitted,

/s/ Ted W. Cassman

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